

# EXHIBIT Q

## Mina Hamilton - DMV.ORG Facebook Page

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**From:** Mina Hamilton  
**To:** Andrew B. Serwin  
**Date:** 9/1/2011 4:18 PM  
**Subject:** DMV.ORG Facebook Page  
**CC:** DeCarlo, Dan; Makous, David

---

Andrew,

We are aware that comments on your clients' Facebook page are being deleted as we speak. As their lawyer, we trust that you have and will continue to instruct your clients of the severe consequences of tampering with and deleting relevant evidence.

Regards,

**Mina I. Hamilton | Partner | Intellectual Property**  
**Lewis Brisbois Bisgaard & Smith LLP**  
t 213.580.7926 | f 213.250.7900 | e [hamilton@lbbslaw.com](mailto:hamilton@lbbslaw.com)  
221 N. Figueroa Street, Suite 1200  
Los Angeles, CA 90012

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by return e-mail and delete the original message from  
your e-mail system. Thank you.  
\*\*\*\*\*

# **EXHIBIT R**

**From:** "Serwin, Andrew B." <ASerwin@foley.com>  
**To:** "Mina Hamilton" <HAMILTON@lbbslaw.com>  
**CC:** "Boggs, Tammy H." <TBoggs@foley.com>, "Solis, Theresa" <TSolis@foley.com...  
**Date:** 9/6/2011 4:59 PM  
**Subject:** RE: Trafficschool.com, et al. vs. Edriver, Inc., et al - Letter from Andrew Serwin to Mina Hamilton dated 9/6/11

Mina,

I do not agree with the conclusions you are attempting to draw, but the Defendants have informed me that they are not currently removing posts from public view on Facebook if they have not taken steps to keep independent copies.

Andy.

---

From: Mina Hamilton [mailto:HAMILTON@lbbslaw.com]  
Sent: Tuesday, September 06, 2011 4:22 PM  
To: Serwin, Andrew B.  
Cc: Boggs, Tammy H.; Solis, Theresa; Josephine Brosas; Dan DeCarlo; David Makous  
Subject: RE: Trafficschool.com, et al. vs. Edriver, Inc., et al - Letter from Andrew Serwin to Mina Hamilton dated 9/6/11

Hi Andrew,

The evidence is clearly relevant (because it admittedly evidences confusion) and was purposely deleted by your clients while it was within their control to do so. As such, your clients have engaged in spoliation, regardless of the purported reasons for doing so. That this data may still be in possession of a third-party (i.e., Facebook), does not relieve your clients of their obligations to maintain and not delete relevant evidence in their possession and control. We understand by your letter and email below that your clients have made no efforts to preserve the evidence that it "removed from public view on Facebook." We hereby again demand confirmation that your client will cease such practices, and we reserve all rights.

-Mina

>>>  
From: "Serwin, Andrew B." <ASerwin@foley.com>  
To: "Mina Hamilton" <HAMILTON@lbbslaw.com>  
CC: "Boggs, Tammy H." <TBoggs@foley.com>, "Solis, Theresa" <TSolis@foley.com>, "Josephine Brosas" <brosas@lbbslaw.com>, "Dan DeCarlo" <DECARLO@lbbslaw.com>, "David Makous" <MAKOUS@lbbslaw.com>  
Date: 9/6/2011 4:05 PM  
Subject: RE: Trafficschool.com, et al. vs. Edriver, Inc., et al - Letter from Andrew Serwin to Mina Hamilton dated 9/6/11  
Mina,

I do not think your email accurately states what I said in my letter. The Defendants have represented that they have preserved what relevant evidence is in their possession, custody or control, but also informed you that certain comments were removed from public view on Facebook. Facebook is a third-party platform over which the Defendants do not have control to delete data from, and Facebook's preservation policies are their own standards. If you believe that there is relevant evidence in Facebook's possession, custody, or control, then you should take whatever steps you deem appropriate to address that. Moreover, the Defendants have, from time to time, removed comments consistent with what I informed you of in my letter and they do not believe the timing is what you suggest below and the resulting inferences you are attempting to draw are, as a result, not well founded.

Andy.

---

From: Mina Hamilton [mailto:HAMILTON@lbbslaw.com]  
Sent: Tuesday, September 06, 2011 2:36 PM  
To: Serwin, Andrew B.  
Cc: Boggs, Tammy H.; Solis, Theresa; Josephine Brosas; Dan DeCarlo; David Makous  
Subject: Re: Trafficschool.com, et al. vs. Edriver, Inc., et al - Letter from Andrew Serwin to Mina Hamilton dated 9/6/11

Andrew,

Thank you for your letter. In the interest of time, I am responding via email.

First, you have misstated the meet and confer conversation. It is not true that Plaintiff's "could not point to any evidence of ongoing deceptive conduct" by your clients --- we certainly did, can and will -- however your refusal to provide us with even Defendants' position and level of ongoing confusion set the tone of the conversation, and Plaintiffs did state that we believe that both confusion and deception is indeed occurring. Moreover, Plaintiffs were never "unwilling to further discuss the contours of a modified injunction"; we simply took your invitation to send you a list of proposed discovery. The fact that your clients subsequently changed their mind about discovery, and subsequently admitted that there is ongoing confusion is your clients' choice, but is not a reason to suggest that Plaintiff has no evidence of deceptive conduct by your client. Indeed, we even specifically pointed out how your clients have deceptively implemented the splash screen over these past three years.

Second, while we disagree with most everything else in your letter, we will rely on the confirmation that your clients have preserved all relevant electronic data. We find it more than interesting that the "complaints that were apparently addressed to a Department of Motor Vehicles" were only recently removed after we informed your clients of our knowledge of their Facebook page and asked them to preserve the comments. Our clients reserve all rights and remedies.

Regards,

Mina I. Hamilton | Partner | Intellectual Property

Lewis Brisbois Bisgaard & Smith LLP  
t 213.580.7926 | f 213.250.7900 | e hamilton@lbbslaw.com

221 N. Figueroa Street, Suite 1200

Los Angeles, CA 90012

\*\*\*\*\*

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\*\*\*\*\*

>>>

From: "Solis, Theresa" <TSolis@foley.com>  
To: <hamilton@lbbslaw.com>  
CC: <brosas@lbbslaw.com>, <decarlo@lbbslaw.com>, <makous@lbbslaw.com>, "Serwin, Andrew B." <ASerwin@foley.com>, "Boggs, Tammy H." <TBoggs@foley.com>  
Date: 9/6/2011 1:59 PM  
Subject: Trafficschool.com, et al. vs. Edriver, Inc., et al - Letter from Andrew Serwin to Mina Hamilton dated 9/6/11

<<ONLINE GURU TRAFFIC SCHOOL Letter to Mina Hamilton from Andy Serwin re responding to their meet & co.PDF>>

Please attached a letter sent on behalf of Andrew Serwin to Mina Hamilton, dated September 6, 2011, in the above-entitled matter.

Terry Solis | Litigation Assistant to Debra Nye and Tammy Boggs | FOLEY & LARDNER LLP | 3579 Valley Centre Drive, Suite 300 | San Diego, CA 92130  
tel: +1.858.847.6843 (direct) | tel: +1.858.847.6700 (general) | fax: +1.858.792.6773 | email: tsolis@foley.com | web: www.foley.com  
<file://www.foley.com>

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# EXHIBIT S



Contact DMV.org Website Support - Windows Internet Explorer

http://www.dmv.org/contact-website-support.php

File Edit View Favorites Tools Help

Google Search Sign In

Favorites Contact DMV.org Website Support

DMV.org is a privately owned website that is not owned or operated by any government agency.

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The DMV Made Simple™

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Search SEARCH California

SEE HOW MUCH YOU CAN SAVE ON AUTO INSURANCE THIS YEAR! Enter Your Zip Code GO

**Main Navigation**

- Practice Tests
- Insurance Center
- Driving Records
- Drivers License & ID
- Registration & Titling
- Vehicle History Reports
- Teens (Under 18)
- Drivers (18 and Older)
- Commercial Drivers (CDL)
- Motorcycle Riders
- Drivers in the Military

Home > Main Navigation >

## Contact DMV.org Website Support

Like 26

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For License or Registration issues, please contact your State DMV Office:  
>> <http://local.dmv.org>

For issues related to using this website, please use the form below:

**\* Required**

**What is your issue relating to? \***

- ☐ A product or service I ordered from an advertiser at DMV.org
- ☐ Report an error with our site (Incorrect information, broken link, etc.)

Feedback

start 9 Novell GroupWise ... 8 Internet Explorer MinaHamiltonLBSPR... Document1 - Microsof... DMV.ORG New Claims 2:47 PM

# EXHIBIT T

DMV Office Locations, Appointment Information and Hours of Operation - Windows Internet Explorer

http://local.dmv.org/

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Local

Driver Services

Register Vehicle

Renew Registration

Apply for License

Renew License

DMV Office Locations

DUI Attorneys

DWI Attorneys

Lemon Law Attorneys

Personal Injury Attorneys

Traffic Ticket Attorneys

Auto Insurance

Motorcycle Insurance

Pav Traffic Ticket

Home > DMV Office Locations >

## DMV Office Locations

Like 10

What's your location?

Enter ZIP code

Example: 60160

Choose a State

Alabama	Louisiana	Ohio
Alaska	Maine	Oklahoma
Arizona	Maryland	Oregon
Arkansas	Massachusetts	Pennsylvania
California	Michigan	Rhode Island
Colorado	Minnesota	South Carolina
Connecticut	Mississippi	South Dakota

Featured Resources:

Driving Records

Vehicle History Reports

Practice DMV Tests

Forms & Publications

Feedback

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Internet 110% 2:50 PM

# EXHIBIT U

DMV Office Locations, Appointment Information and Hours of Operation - Windows Internet Explorer

http://local.dmv.org/

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Local

- Driver Services
  - Register Vehicle
  - Renew Registration
  - Apply for License
  - Renew License
- DMV Office Locations
- DUI Attorneys
- DWI Attorneys
- Lemon Law Attorneys
- Personal Injury Attorneys
- Traffic Ticket Attorneys
- Auto Insurance
- Motorcycle Insurance
- Pay Traffic Ticket

Home > DMV Office Locations >

## DMV Office Locations

Like 10

What's your location?

91105

Example: 60160

Choose a State

Alabama	Louisiana	Ohio
Alaska	Maine	Oklahoma
Arizona	Maryland	Oregon
Arkansas	Massachusetts	Pennsylvania
California	Michigan	Rhode Island
Colorado	Minnesota	South Carolina
Connecticut	Mississippi	South Dakota

Featured Resources:

- Driving Records
- Vehicle History Reports
- Practice DMV Tests
- Forms & Publications

Feedback

start

Novell GroupWise ... Internet Explorer Microsoft Office ... DMV.ORG New Claims Document1.pdf - Ado... 2:51 PM

# EXHIBIT V



Pasadena, CA DMV - DMV Office Location in Pasadena at DMV.org: The CA DMV Made Simple - Windows Internet Explorer

http://local.dmv.org/california/los-angeles-county/pasadena/dmv-office-locations.php

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Favorites Pasadena, CA DMV - DMV Office Location in Pasadena...

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Local

- Driver Services
  - Register Vehicle
  - Renew Registration
  - Apply for License
  - Renew License
  - DMV Office Locations**
  - DUI Attorneys
  - DWI Attorneys
  - Lemon Law Attorneys
  - Personal Injury Attorneys
  - Traffic Ticket Attorneys
  - Auto Insurance
  - Motorcycle Insurance
  - Pay Traffic Ticket

Home > DMV Office Locations > California > Los Angeles > Pasadena

## Pasadena, CA > DMV Office Location

Like

- Pasadena DMV Office**  
49 S. Rosemead Blvd.  
Pasadena, CA 91107  
(800) 777-0133
- Lincoln Park DMV Office**  
3529 N. Mission Road  
Los Angeles, CA 90031  
(800) 777-0133
- Montebello DMV Office**  
424 N. Wilcox Ave.

**Featured Resources:**

- Driving Records
- Vehicle History Reports
- Practice DMV Tests
- Forms & Publications

La Crescenta-Montrose  
La Canada Flintridge  
Burbank  
Altadena

Internet 110%

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# **EXHIBIT W**



Pasadena DMV - Pasadena Department of Motor Vehicles Office Location at DMV.org: The CA DMV Mad - Windows Internet Explorer

http://local.dmv.org/california/los-angeles-county/pasadena/49-s.-rosemead-blvd./dmv-office-locations.php

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**SAVE MONEY ON CAR INSURANCE IN 2011!** Enter Your Zip Code Get Quotes >>

**Local**

- Driver Services
  - Register Vehicle
  - Renew Registration
  - Apply for License
  - Renew License
  - DMV Office Locations**
  - DUI Attorneys
  - DWI Attorneys
  - Lemon Law Attorneys
  - Personal Injury Attorneys
  - Traffic Ticket Attorneys
  - Auto Insurance
  - Motorcycle Insurance
  - Pav Traffic Ticket

Home > DMV Office Locations > California > Los Angeles > Pasadena > 49 S. Rosemead Blvd.

## Pasadena DMV Office of Pasadena, California

Like 1

**Online Services**

Save Time, Skip the Line! There are many online providers that offer the following DMV services in California.

- Auto Insurance Quotes
- Credit Reports
- Practice Permit Tests
- Road Sign Practice Test
- Title Transfers
- Bill of Sale
- Motorcycle Registration
- Registration Renewal
- Traffic School
- Vehicle History Reports

**Address of Pasadena DMV**

**View of Pasadena DMV Office Location**

Photos

Google © 2011 Google Report a problem

E Foothill Blvd Arboleda St Foothill Fwy 30B N Quigley Ave Corta Calle St

Internet 110%

start 9 Novell GroupWise ... 9 Internet Explorer 3 Microsoft Office ... DMV.ORG New Claims Document1.pdf - Ado... 2:53 PM

# **EXHIBIT X**

California Traffic Schools Online Guide - Find CA Internet Traffic Ticket School Info - DMV Gui - Windows Internet Explorer

http://www.dmv.org/ca-california/traffic-schools.php

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Google Search More >> Sign In

Favorites California Traffic Schools Online Guide - Find CA Inter...

## Traffic Schools in California

Like

FEATURED CALIFORNIA TRAFFIC SCHOOL SPONSORS

**I DRIVE SAFELY**

Approved  
**California Traffic School**

- 100% Online
- California State Approved
- 3D Multimedia
- Fun, Fast & Easy

Introducing Traffic School,  
built just for YOU!

**Register Now**

If you have received a traffic ticket in California, then a California State Approved Traffic School is a great way to dismiss your traffic ticket and lose the points from your driving records. **I Drive Safely** is a good choice for California traffic school online.

The successful completion of a course from one of the approved traffic schools may prevent violations from damaging your driving record. While in many cases a course just might get a traffic ticket dismissed, attending traffic school can also enhance your driving knowledge and skill level, and it may increase your overall safety awareness so that you, your family, and other drivers can be safer on the roads.

### Local Traffic Schools

**Suspended License**  
**Traffic Tickets**  
**Traffic Schools**  
**Defensive Driving**  
**DUI & DWI**  
**Driver Handbook**  
**DMV Point System**  
**Laws & Attorneys**  
**Driving Records**  
**Insurance**  
**Warrants**  
**Accident Guide**

**Location: California**  
Change Location

**Practice Tests**  
**Insurance Center**  
**Driving Records**  
**Drivers License & ID**  
**Registration & Titling**

**DMV.ORG on Facebook**  
Like

63,772 people like **DMV.ORG**.

Jai Michelle Garriane  
Shahania Cesar Brian Jina

Facebook social plugin

**Get a FREE Quote**  
**Compare Auto Insurance Rates Online and Save!**  
**PROGRESSIVE**

- You could save hundreds!
- Get a FREE quote
- 24/7 live support

Enter Zip Code Go >>

**Find Your Local DMV Office**

start 9 Novell GroupWise ... 9 Internet Explorer 3 Microsoft Office ... DMV.ORG New Claims Document1.pdf - Ado... 2:55 PM

# **EXHIBIT X-1**

Registration Renewal in California - Renewing your vehicles registration with the CA DMV - Windows Internet Explorer

http://www.dmv.org/ca-california/registration-renewal.php

File Edit View Favorites Tools Help

Registration Renewal in California - Renewing your ve...

Home License & ID Registration & Titling Reports & Records Tickets & Violations Insurance Buying & Selling

Main Navigation

Registration & Titling

Register Car

**Registration Renewal**

Replacing a Lost Registration

RV & Motorhome Registration

Custom Built Car Registration

Boat Registration and Licenses

Title Transfers

Replacing a Lost Title

Salvaged Vehicles

Special Vehicles

Drivers with Disabilities

License Plates & Placards

Smog & Emission Checks

Feedback

Home > California Home > Main Navigation > Registration & Titling >

## Registration Renewal in California

Like 31

### Renew Your California Vehicle Registration Today!

Official California Vehicle Registration & Stickers Issued.  
Overnight Delivery Available.

Free DMV Lookup & Instant Fee Calculation

License Plate # Last 5 Digits of VIN Zip Code

**Calculate Fees**

**CARTAGZ**  
VEHICLE REGISTRATION

Renew your California Vehicle Registration online and Cartagz will instantly issue your official California registration and stickers.

**California Car Registration Online with CarTagz**

1,155 people on this site

DMV.ORG on Facebook

Like

65,277 people like DMV.ORG.

Tadpole Antonio 'Ag' Said

Lizbeth Gerardo Tamika

Facebook social plugin

**Get a FREE Quote**

**Compare Auto Insurance Rates Online and Save!**

**GEICO**

- You could save 15% or more
- 24 hour claims service
- Get a FREE instant quote.

Error on page.

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Defensive Driving | Online Defensive Driving Courses & Traffic School - Windows Internet Explorer

http://www.idrivesafely.com/?COUPON=DMVCDG

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Google Search More >> Sign In

Defensive Driving | Online Defensive Driving Courses ...

**I DRIVE SAFELY** Defensive Driving, Traffic School & More  
Simple. Affordable. Hassle-Free

Customer Service (800) 723-1955  
[Live Chat](#) | [FAQs](#) [Student Login](#)

+1 Like 8578 likes. Sign Up to see what your friends like.

+ Home + About Us + 24/7 Support + How It Works

For more info: select state... [GO](#)

# The Leader in Online Traffic School/Defensive Driving

OUR COURSES ARE  
Created by Professional Instructors | Approved Nationwide | Designed for Maximum Convenience

[View Video](#) [Price & Details](#) [Register Now](#)

Double-click to change security settings

**Defensive Driving/Traffic School**  
Simple. Affordable. Hassle-Free.

**Teen Drivers Education**  
Do it easy.  
Do it fast.  
Do it online.

**Texas Adult Drivers Ed**  
For Adults 18 and over.

**Mature Insurance Reduction**  
Easy-to-take.  
Simple-to-complete.

**Approved Driving Record**  
Easy online ordering

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# **EXHIBIT X-2**

